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8 *Co-Lead/Liaison Counsel for Plaintiffs*
9

10 **IN THE UNITED STATES DISTRICT COURT**

11 **FOR THE DISTRICT OF ARIZONA**

12 **IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION**

13 MD No. 02641
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17 **NOTICE OF SUBMISSION OF
PROPOSED CASE MANAGEMENT
ORDER RE RULES, POLICIES,
PROCEDURES, AND GUIDELINES
RELATING TO ESTABLISHING
COMMON BENEFIT FEE AND
EXPENSE FUND**

18 In accordance with this Court's Case Management Order No. 2, Plaintiffs' Co-
19 Lead/Liaison Counsel submit a proposed form of case management order to address rules,
20 policies, procedures, and guidelines relating to establishing common benefit fee and
21 expense fund.

22 DATED this 6th day of November, 2015.

23
24 **GALLAGHER & KENNEDY, P.A.**

25 By: /s/ Robert W. Boatman
26 Robert W. Boatman
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Co-Lead/Liaison Counsel for Plaintiffs

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 6th day of November 2015, I electronically transmitted
3 the attached document to the Clerk's Office using the CM/ECF System for filing and
4 transmittal of a Notice of Electronic Filing.

5 */s/ Nancy Jo Koenes* _____

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